

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

|                           |   |                        |
|---------------------------|---|------------------------|
| UNITED STATES OF AMERICA, | ) |                        |
|                           | ) |                        |
| Plaintiff,                | ) |                        |
|                           | ) |                        |
| v.                        | ) |                        |
|                           | ) | No. S2-4:09 CR 757 CAS |
| JEFFREY GREENWELL,        | ) |                        |
|                           | ) |                        |
|                           | ) |                        |
| Defendant.                | ) |                        |

**GOVERNMENT’S SUGGESTED VOIR DIRE QUESTIONS**

COMES NOW the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Carrie Costantin, Assistant United States Attorney for said District, and requests the following voir dire questions to be put to this panel of prospective jurors:

1. Does any member of this jury panel know the United States Attorney, Mr. Richard G. Callahan, or the Assistant United States Attorney Carrie Costantin, or any other member of the United States Attorney’s Office?

2. Does any member of this jury panel know the case agent in this matter, FBI Special Agent Michael Maruschak?

3. Does any member of this jury panel know the defendant in this matter, Mr. Jeffrey Greenwell or his attorney, Ms. JoAnn Trog?

4. During the course of this trial, the Government will present the testimony of some or all of the following witnesses: [See Witness List]. Does any member of this jury panel know any

of these individuals? Is there anything about your relationship with any of these people which would make it difficult or impossible for you to reach a fair and impartial verdict in this matter if you are chosen as a juror?

5. Has any member of this jury panel served as a juror before, either civil or criminal? What was the nature of the case? How long ago did you serve? Were you the foreperson of that jury? Did the jury on which you served reach a verdict? Has any member of this jury panel served as a Grand Juror?

6. Has any member of this jury panel, or a close friend or relative, ever been the victim of a crime? Was anyone apprehended for that crime? Were you satisfied with the police work or do you feel that the police should have done more?

7. Has any member of this jury panel, or a close friend or relative, ever been arrested, charged or convicted of a crime other than a traffic violation? Do you feel that justice was done or that the result was unfair?

8. Were you, or any member of your family, or any close friend, ever a witness in a criminal case?

9. There will be testimony in this case from law enforcement officers. Does anyone on the panel feel that a law enforcement officer's testimony is more or less trustworthy than the testimony of another witness? Has any member of the panel had a particularly bad experience with a law enforcement officer?

10. Does anyone on the panel have a close friend or relative in law enforcement?

11. Defendant is charged with Sexual Exploitation of a Child, that is, producing child pornography. Is there anything about the nature of these charges that would make any member

of the panel unable to render a fair and impartial verdict?

12. The minors in the images range in age from four years old to fourteen and fifteen years old. Is there anyone who believes that production of child pornography involving a fourteen or fifteen year old should not be a crime?

13. Is there anyone who has been a victim or accused of committing a sexual offense or has a close friend or relative who has been a victim or accused of committing a sexual offense, whether or not the offense was ever reported to the police? Would you be able to set aside those experiences and based your decision in this case only on the evidence presented in court?

14. Is there anyone who for personal or religious reasons believes that he or she cannot sit in judgment of another person?

15. Does everyone understand that the defendant is presumed innocent until proven guilty by the Government beyond a reasonable doubt?

16. Does anyone on the panel feel that the Government should be held to a higher burden of proof, such as proof beyond all possible doubt?

17. Does anyone know of any reason why he or she cannot be fair to both sides and render a verdict solely on the evidence presented in this Court and upon the law as the Court shall give you in its instructions?

Respectfully submitted,

RICHARD G. CALLAHAN  
United States Attorney

s/Carrie Costantin

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CERTIFICATE OF SERVICE

I hereby certify that on June 9, 2011, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Ms. JoAnn Trog  
121 West Adams  
St. Louis, MO 63122

s/Carrie Costantin

CARRIE COSTANTIN 54734  
Assistant United States Attorney